

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-vs-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA INC.,

Defendants.

Case No. 3:18-cv-966-MJR-DGW

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO PLAINTIFF'S COMPLAINT**

1. NOW COME Defendants YUKE'S CO., LTD. ("Yuke's"), and YUKE'S LA, INC. ("Yuke's LA") by and through their Attorneys, DALE CENDALI and JOSHUA SIMMONS of KIRKLAND & ELLIS LLP (collectively, "Moving Defendants"), and pursuant to Federal Rule of Civil Procedure 6, hereby move this honorable Court for an extension of time to file a response to Plaintiff CATHERINE ALEXANDER's ("Plaintiff") Complaint, to July 9, 2018, the date on which all other Defendants' responses to Plaintiff's Complaint are due. In support thereof, Moving Defendants state as follows:

2. On April 17, 2018, Plaintiff, an individual resident of Illinois, filed her Complaint alleging that Defendants infringed certain copyrights by creating the video game series *WWE 2K*. [Doc. 1].

3. Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., World Wrestling Entertainment, Inc., and Visual Concepts Entertainment previously were

served, and this Court previously granted them extensions of time to file their responses to the Complaint to July 9, 2018 [Doc. 35, 38].

4. Yuke's and Yuke's LA have now been served.

5. As Counsel for Moving Defendants only was recently retained, due to the nature and complexity of the case, and because all other Defendants have received extensions to file their responses to the Complaint by July 9, 2018, Moving Defendants respectfully request an extension of time to July 9, 2018, to respond to Plaintiff's Complaint.

6. Counsel for Moving Defendants contacted counsel for Plaintiff regarding the requested extension. Counsel for Plaintiff stated that they have no objection to this extension.

7. This motion is made in good faith and is not intended to cause undue delay.

WHEREFORE, for the above and foregoing reasons, Moving Defendants respectfully request this honorable Court grant them an extension of time to file a response as stated herein.

Dated: May 30, 2018

Respectfully submitted,

/s/Dale M. Cendali

Dale M. Cendali (admitted *pro hac vice*)
Joshua L. Simmons (admitted *pro hac vice*)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com

Attorneys for Defendants 2K Games, Inc., 2K Sports, Inc., Take-Two Interactive Software, Inc., Visual Concepts Entertainment, Yuke's Co., Ltd., and Yuke's LA, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-vs-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA INC.,

Defendants.

Case No. 3:18-cv-966-MJR-DGW

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2018, the foregoing document, **Motion for Extension of Time**, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Anthony G. Simon	asimon@simonlawpc.com
Benjamin R. Askew	baskew@simonlawpc.com
Anthony R. Friedman	afriedman@simonlawpc.com
R. Seth Crompton	scrimpton@allfela.com

/s/Dale M. Cendali

Dale M. Cendali (admitted *pro hac vice*)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com

Attorney for Defendants 2K Games, Inc., 2K Sports, Inc., Take-Two Interactive Software, Inc., Visual Concepts Entertainment, Yuke's Co., Ltd., and Yuke's LA, Inc.